

Comments on RM-11338

By Steven Weddington

Prayer Tower Mission

Cassopolis Michigan

Prayer Tower Mission is the Licensee of LPFM station WLWZ-LP.

We support the NAB Proposal to allow AM stations to use FM translator frequencies for fill in service in the same local area covered by the stations 2mv/m contour. However we are asking that the NAB and the FCC consider a different twist to that proposal. Our LPFM station has been on the air for about two years. Coming up with all local programming 24 hours a day is a lot harder than we thought. When we are not doing live programming we revert to automated music.

We think that LPFM stations whose 60 dbu contour falls inside the 2mv/m contour of a local AM station licensed to the same community should be able to allow that station to use the LPFM station as a translator when the AM station is operating at reduced night power or when the local "Day" only station is off the air. In our town we would not object to the only other station licensed to our city, using our signal to fill in their coverage at night. It would be a very practical use of our frequency when we do not have local programming.

We think the FCC should allow LPFM stations the flexibility to serve as translators as long as strict criteria is in place. The LPFM station could only be used by an AM station that:

1. Is a Class C Daytime only or Daytime with PSSA night operation.
2. The AM station 2mv/m contour totally covers the LPFM station 60dbu contour at current tower sites.
3. The AM station is a stand alone operation with no FM station in the market.

While our LPFM station can offer more diversified programming choices in the area of service, we are no match for a commercial station when it comes to resources like news staff and ability to cover breaking events and supply first hand weather information. We would like the flexibility of having the local AM station retransmitted on our signal as an option that will serve the public interest by extending the reach of the AM station at night and calling attention to our dial location and alternative programming during the day. We would always reserve the right to maintain control over our signal as required by FCC regulations but we would have the option of boosting the coverage of the heritage AM in our market. We think such flexibility is true operation in the public interest, and promotes cooperation between local broadcast outlets with different listener bases. Further we think that allowing such a relationship between a local LPFM and a long standing local AM station can benefit both operations.

Our young volunteer staff can learn a lot from the more experienced staffers at the local AM station. But under current rules we are competitors. Allowing us to work together could open new doors for our folks to work side by side with the pros and better learn this business. If the reader recalls some AM stations objected to the creation of the LPFM service fearing it would run them out of business. In our case I do not think we made enough of an impact to substantially hurt the local AM but I am sure we can serve to help them and ourselves by having the option of allowing them on our air for fill in.

If the FCC can modify the current rules that prohibit an LPFM station from rebroadcast of any commercial station, relief for some AM stations could take place immediately without the need to hunt for new translator frequencies and the delay that would occur due to current freezes and questions of which translator request should be honored first.

An alternate proposal would allow an AM station meeting the criteria mentioned above to use an LPFM station pending the adoption of new translator regulations. Upon the implementation of the new translators regulations with respect to AM stations, the AM station using an LPFM for rebroadcast would have to cease such service and apply for an FM translator of its own if available..

We think the spirit of the NAB petition would be enhanced by allowing LPFM stations to serve as limited translators for local AM stations. This is not the perfect answer for an AM station in that maximum coverage at 100 watts ERP would be less than the 250 max allowed for translators but in many areas it would serve the AM station well in the interim while waiting for final action on AM use of translators.

We further believe that such modification of current LPFM regulations would not cause a rush of any kind. While we have not studied every LPFM station in the country, we believe that only a reasonable number are in a position to meet the suggested criteria with respect to a local Daytime AM station in need of relief.

Such use of the LPFM would of course be voluntary on behalf of the LPFM. Rules could be put in place to assure that nothing more than a nominal fee could be charged by the LPFM for use by the AM.

Again, this relief could take place for the limited number of LPFM/AM Daytimer pairs that would meet the criteria immediately.

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